

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

<b>UNITED STATES OF AMERICA,</b> <b>Plaintiff,</b>  <b>v.</b>  <b>GOVERNMENT OF PUERTO RICO,</b> <b>et al.,</b>  <b>Defendants.</b>	CASE NO. 12-2039 (GAG)
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**ACLU'S MOTION EXPRESSING APOLOGIES TO THE COURT**

**TO THE HONORABLE COURT:**

Comes now the parties, through the undersigned attorneys, and respectfully states and alleges as follows.

1. On April 4<sup>th</sup> 2017, this Honorable Court issued an agenda for the May 22nd public hearing on the Puerto Rico Police Reform, which included William Ramírez, Esq. Director, ACLU Puerto Rico, *amicus* party, as deponent. The Court indicated that deponent's written statement shall be filed no later than Friday, May 19, 2017 at noon. (Dkt. 521)

2. ACLU of Puerto Rico Director, William Ramírez, intended to file a written statement addressing the specific inquiries the Court enumerated in the agenda. However, the Directors' health was seriously affected as a consequence of the exposure to CN Tear Gas deployed by the PRPD while he was performing duties as legal observer for the ACLU on May 1<sup>st</sup>, 2017. ACLU of Puerto Rico director required ongoing medical attention, strong medication and daily respiratory therapy. The effects of the CN Tear Gas have not ceased and he continues under treatment.

3. On this date, the ACLU of Puerto Rico Director met with the Technical Compliance

Advisor, Arnaldo Claudio, to discuss the events of May 1<sup>st</sup> 2017, and shared with him his current condition and confirmed his willingness to participate in the hearing.

4. The ACLU of Puerto Rico profoundly apologizes to the Court for not submitting a written statement, as required. However, the ACLU of Puerto Rico director will be attending the May 22<sup>nd</sup> hearing and will be available to respond to any questions this Honorable Court may have. The ACLU of Puerto Rico will continue to collaborate with the Court in the Puerto Rico Police Reform process, and will remain available to assist the Court and its officials, as deemed necessary by the Court.

**WHEREFORE**, the *amici* ACLU of Puerto Rico respectfully requests this Honorable Court to take notice of the foregoing.

**I HEREBY CERTIFY** that on this same date, I have electronically filed the foregoing with the Clerk of the Court using CM/ECF system, which will send notification of such filing to all attorneys of record.

In San Juan, Puerto Rico, on this May 19, 2017.

Respectfully submitted,

*/S/ Josue Gonzalez-Ortiz,*

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*/S/ William Ramirez-Hernandez, Esq.*

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